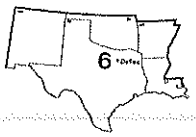


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SUPERFUND SITE STRATEGY RECOMMENDATION - REGION 06

Site Name: Manufacturing Specialties, Inc. **CERCLIS ID#:** TXD147111538

Alias Site Name: NA

687909

Address: 1834 Carpenter Road

City/County or Parish/State/Zip: Hutchins/Dallas County/Texas/75134

Report Type: Site Inspection **Date:** April 8, 2013 **Author:** TCEQ - Nancy Johnson

RECOMMENDATION:

☒ 1. No Further Remedial Action Planned Under Superfund (NFRAP)

☐ 2. Further Investigation Needed Under Superfund
☐ PA ☐ HRS Priority: ☐ High
☐ SI ☐ RI/FS ☐ Low
☐ ESI ☐ RA
☐ Other:
To be performed by:

☐ 3. Action Deferred to: ☐ RCRA ☐ NRC

☒ 4. Site Being Addressed Under the State Voluntary Cleanup Program (VCP): ☐ Yes ☒ No

NOTIFY AUTHORITY:

☒ Removal	☐ RCRA	☐ TSCA	☐ CAA	☐ SMCRA
☐ Remedial	☐ State/Tribe	☐ NPDES	☐ NRC	☐ Resource Trustee:
☐ CERCLA Enforcement	☐ Federal Facility	☐ UIC	☐ SPCC	☐ Other:

SEND SSSR COPIES TO: ☐ 6SF-AC ☐ 6WQ-SP ☐ ATSDR ☒ State Agency ☐ Tribal Agency

DISCUSSION:

The former Manufacturing Specialties, Inc. (MSI) property consists of approximately three acres and is located in a rural industrial area approximately 0.8 mile west of Interstate 45 in Hutchins, Texas. MSI manufactured polishes, dyes, and other organic preparations used to make and maintain leather goods. MSI began operating at the property as early as 1992, and may have operated under the names DYO Chemical Company or DYO-Flex Corporation as early as 1981. Directly north and west of the former MSI property is a commercial/industrial area. Ferrell Gas LP (Blue Rhino propane) owns and operates from two properties directly north and northwest of the former MSI property. A trucking company, Protech, operates from the property directly west of the former MSI property, across Carpenter Road. The properties directly south and east of the former MSI property appear to be used for agricultural purposes. The nearest residence is approximately 650 feet east of the former MSI property near the intersection of Della Road and Vanderbilt Road.

According to Dallas County Central Appraisal District records, Extreme Research, Inc. is the present owner of the former MSI site. A Deed Without Warranty was executed by John C. Mills, President of MSI, in December 2010, naming Extreme Research, Inc. as owner of the property. The deed was recorded in Dallas County in May 2011; however, Extreme Research, Inc. has denied ownership based on non-acceptance of the deed.

Improvements at the former MSI property consist of an 11,000 square foot concrete slab where the main production building was located before it completely burned down in September 2007. Other improvements at the property include a shed and two above-ground storage tanks (ASTs) in a concrete impoundment. The metal pole shed is approximately 1,300-

square feet in size, roofed, walled on three sides, and built on a concrete slab foundation. The ASTs are both approximately 11 feet tall and 9 feet in diameter, and sounded empty when struck with a pipe. The ASTs are located in an approximately 1,600-square foot concrete impoundment with 2.5-foot high walls. The property is surrounded by a 6-foot chain link fence topped with three strands of outward angled barbed wire. The south gate was unlocked and open during the May 10, 2011, site visit.

On September 30, 2007, an electrical fire started in MSI's production building. The Dallas Fire Rescue and Lancaster Fire Departments responded to the fire and inundated the production building with water; however, the building and most of MSI's raw material and finished goods were destroyed. The water flowed across the building and concrete slab foundation and pooled on the southeast portion of the property. The non-hazardous debris from the fire was removed by Lloyd Nabors Company and received by Gamtex Industries for disposal in October 2007. Approximately 165 tons of soil, affected by the fire suppression, and fire debris was removed by TAS Environmental, Inc. and consigned to Allied Waste for disposal in November 2007. TAS Environmental also collected approximately 15,000 gallons of water from the southeast portion of the MSI property and stored it in a portable tank. The collected water was consigned to Intergulf for disposal on December 5, 2007. On February 14, 2008, Preservation Assessment Services, LLC, doing business as Aqua Terra Assessments, collected 15 soil samples at a depth of six inches below ground surface (bgs) from the area affected by the fire and the subsequent suppression efforts. Seven background soil samples were collected at a depth of six inches bgs in areas not affected by the fire, along the north and west perimeters of the MSI property. Lead and TPH were detected above background concentrations in one sample. Soil in a ten foot radius around this sample location was excavated to a depth of two feet. The excavated soil was placed on, and covered with, plastic sheeting on the former production building's concrete slab and surrounded with hay bales. In May 2008, an additional excavation of the top two feet of soil around six other sampling locations was conducted at the behest of the TCEQ. The additional excavated soil was reportedly placed on concrete areas on site.

A TCEQ Region 4 Water Quality inspector revisited the MSI property on June 11, 2008, and observed excavated soil on, and partially covered by plastic sheeting on the former production building's concrete slab and surrounded by hay bales. Approximately forty 55-gallon drums, an estimated four to five 275- to 350-gallon plastic totes, and two 350-gallon stainless steel totes, all containing unknown material, were also observed on the concrete slab. An additional large pile of affected soil was observed on the driveway near what had been the loading dock for the facility. The TCEQ Region 4 Water Quality inspector visited the MSI property again on November 17 or 18, 2010, and observed that the soil piles and most of the drums and plastic totes were still on site. On March 23, 2011, a TCEQ Voluntary Cleanup and Corrective Action Section Project Manager visited the MSI property and observed approximately fifty to sixty 55-gallon drums and two 275-gallon plastic totes in or near the metal pole shed. The two 350-gallon stainless steel totes and some of the 275-350 gallon plastic totes observed in 2008 had apparently been removed from the property.

A site visit in support of this Preliminary Assessment report was conducted on May 10, 2011. The property conditions had not changed since the previous site visit conducted on March 23, 2011. Two 55-gallon drums, one steel and one plastic, were located on the former production building's concrete slab. The steel drum was intact, but lidless and filled with a soft, polymer like, white substance. The plastic drum was intact, but its lid was unsecured; the drum appeared to be full and was labeled as containing Primal E-3068, an acrylic binder chemical. Three 55-gallon drums and two 275-gallon plastic totes were located near the outside of the metal pole shed. Two of the drums were empty and the third drum, next to the west side of the shed, was intact and filled with an oily liquid. Approximately fifty to sixty 55-gallon drums were located inside the metal pole shed. A majority of the drums appeared to be unlabeled and full, but in good condition. Two ASTs were located on site in an approximately 1,600 square foot concrete impoundment with approximately 2.5-foot high walls. The ASTs were each approximately 11 feet tall and 9 feet in diameter with an estimated volume of 700 cubic feet or 5,236 gallons. The ASTs appeared to be empty and it is unknown what was previously contained in them. Black staining was observed on the concrete within the impoundment indicating a possible release of unknown hazardous substances from the ASTs. The concrete impoundment appeared to be in good condition with no major cracks in its surface. Six piles of soil, affected by the fire suppression and excavated in February 2008, were still on site. Five of the soil piles are approximately 150 square feet in area and one is approximately 100 square feet in area. The piles ranged in estimated height from one foot to four feet. The piles were on top of plastic sheeting, surrounded by hay bales, and were located on the former production building's concrete slab. Weeds and grass were also observed growing on the soil piles. The piles were no longer covered in plastic and grass was growing from the soils. A large grass covered mound of soil, assumed to be excavated soil from remedial activities in May 2008, was located on the southern portion of the former MSI property between the property's fence and former production building's concrete slab.

According to the Texas Water Development Board's Water Information Integration & Dissemination System, five public water system (PWS) wells; eighteen domestic use wells; seven irrigation, stock, or industrial use wells; and three unknown use wells are located within the 4-mile TDL and are operational. Depths of these wells range from 25 to 3,669 feet bgs. No wells are on site and the site is not located within a wellhead protection area.

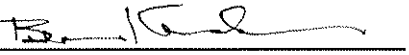
Surface water runoff on the former MSI property flows southeast into a drainage ditch that runs west to east along the southern perimeter of the property along Della Road. From the southeast corner of the property, the drainage ditch runs approximately 600 feet east to the intersection of Della and Vanderbilt Roads. The drainage ditch turns south and runs under Della Road and then along Vanderbilt Road for approximately 970 feet before entering Cottonwood Creek, a tributary of Tenmile Creek. Tenmile Creek flows east into the Trinity River (TCEQ-classified segment 0805, Upper Trinity River). The 15-mile TDL terminates in the Trinity River.

On-site potential sources are located within 200 feet of three adjacent workplaces to the northeast, north, and west. Potential commercial agricultural or livestock grazing land, to the east and south of the potential source areas, are within 200 feet. No schools, day cares, commercial silviculture, livestock production, or sensitive environments are within 200 feet of the potential source areas. The former MSI property is fenced, but gates were unlocked and open and the site was accessible to the public during the May 10, 2011, site visit.

The field sampling event for this Site Inspection (SI) was conducted from May 15 through May 17, 2012. During the SI, three ground water samples and 23 soil samples were collected and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total metals, mercury, and cyanide. Four metals (cobalt, lead, silver, and zinc) and one SVOC (bis(2-ethylhexyl)phthalate) were detected at significant concentrations in soil samples collected from potential source areas, but concentrations of these analytes were all below SCDM soil exposure pathway benchmarks. No metals, VOCs, or SVOCs were detected at significant concentrations in the off-site ground water migration or soil exposure pathway samples.

Based on the information gathered during the Site Inspection, the Manufacturing Specialties, Inc. site does not appear to meet the criteria necessary for listing on the National Priorities List (NPL) of federal Superfund sites. As such, it is recommended that the site receive a designation of "No Further Remedial Action Planned" (NFRAP) in CERCLIS. However, because of the remaining potential sources (i.e., 55-gallon drums, totes, ASTs, and contaminated soil piles) which could potentially pose a future threat to the environment, the site has been referred to the EPA Region 6 Superfund Removal Section for consideration. The State will be provided a copy of this decision document.

APPROVALS:

Report Reviewed by:	Bret Kendrick (Site Assessment Manager)	**Signature:**		**Date:**	07/31/13
Disposition Approved by:	Chris Villarreal (Section Chief 6SF-TR)	**Signature:**		**Date:**	8/1/2013